

# Exhibit “A”

Justin H. Sperling, Esquire  
Atty Id No.: 212012016  
ARONBERG, KOUSER, SNYDER  
& LINDEMANN, P.A.  
430 Route 70 West  
Cherry Hill, NJ 08002  
(856) 429-1700  
[jsperling@akplaw.net](mailto:jsperling@akplaw.net)  
Attorneys for Plaintiff

ARYANNA E. OCASIO and MICHELL  
OCASIO

Plaintiffs,

vs.

JAMES STILL, SAND DOLLAR  
SPECIALIZED & HEAVY HAUL, JOHN  
DOES 1-10 (fictitious names of individuals or  
corporations which cannot be ascertained at  
this time) and ABC Corps 1-10 (fictitious  
names of individuals or corporations which  
cannot be ascertained at this time),  
individually, jointly, severally and/or in the  
alternative.

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
GLOUCESTER COUNTY

Docket No.:

Civil Action

**COMPLAINT AND JURY DEMAND**

Plaintiffs, Aryanna E. Ocasio residing at 127 Pfeiffer Street, City and County of Camden and State of New Jersey and Michell Ocasio residing at 2402 39<sup>th</sup> Street, Township of Pennsauken, County of Camden and State of New Jersey by way of Complaint against the defendants, James Still residing at 1259 Kitts Hummock Road, City of Dover, County of Kent and State of Delaware, Sand Dollar Specialized & Heavy Haul with principal business offices located at 7619 Hidden Meadow, City of Greenwood, County of Sussex and State of Delaware, John Does 1-10 (fictitious names which cannot be ascertained at this time), and ABC

Corporations 1-10 (fictitious names of persons or corporations which cannot be ascertained at this time), individually, jointly, severally and/or in the alternative say that:

**FIRST COUNT**

1. On or about the 21st day of December, 2018, plaintiff, Aryanna E. Ocasio was the operator of a motor vehicle which was owned by Michael T. Lee, Jr., which was traveling in the right lane of travel on northbound I-295 in the vicinity of MP 21.4, Township of Deptford and County of Gloucester and State of New Jersey.

2. At the same time and place alleged, defendant James Still was the operator of a motor vehicle which was owned by Sand Dollar Specialized & Heavy Haul, which was traveling in the right lane of travel on northbound I-295 in the vicinity of MP 21.4, Township of Deptford and County of Gloucester and State of New Jersey when he failed to observe, failed to stop, and failed to operate his motor vehicle in a safe manner causing a collision with the rear of a vehicle being operated by the plaintiff, Aryanna E. Ocasio.

3. As a direct and proximate result of the aforesaid carelessness, recklessness and negligence of the defendant James Still, the plaintiff Aryanna E. Ocasio sustained severe personal injuries which include permanent loss of use of a body member, significant limitation of a bodily function and/or such serious injuries which prevent plaintiff and will prevent plaintiff from performing her usual activities and will in the future force plaintiff to incur medical expenses in the care and treatment of said injuries and has been and will in the future cause plaintiff to be unable to continue with her normal course of activities.

WHEREFORE, plaintiff Aryanna E. Ocasio demands judgment against the defendant James Still in a sum which will reasonably compensate her for the injuries and damages

sustained together with interest and costs of suit.

### **SECOND COUNT**

1. Plaintiffs hereby repeats the allegations of the First Count and incorporates same into this Count as if set forth more fully herein.

2. At the same time and place aforesaid, the defendant, Sand Dollar Specialized & Heavy Haul, was the owner of the motor vehicle being driven by the defendant, James Still which was involved in the aforementioned motor vehicle accident.

3. The defendant, Sand Dollar Specialized & Heavy Haul did so carelessly and negligently entrust their motor vehicle to the use of the defendant, James Still so as to cause a violent collision with the motor vehicle being operated by the plaintiff, Aryanna E. Ocasio.

4. As a direct and proximate result of the aforesaid carelessness, recklessness and negligence of the defendant, Sand Dollar Specialized & Heavy Haul, the plaintiff sustained personal injuries which include permanent loss of use of a body member; significant limitation of a bodily function and/or such serious injuries which prevented plaintiff and will prevent plaintiff from performing her usual activities and will in the future force plaintiff to incur medical expenses in the care and treatment of said injuries and has been and will in the future cause her to be unable to continue with her normal course of activities.

WHEREFORE, plaintiff Aryanna E. Ocasio demands judgment against the defendant Sand Dollar Specialized & Heavy Haul in a sum which will reasonably compensate her for the injuries and damages sustained together with interest and costs of suit.

### **THIRD COUNT**

1. Plaintiffs hereby repeat the allegations of the First through Second Counts and

incorporates same into this Count as if set forth more fully herein.

2. Plaintiff, Aryanna E. Ocasio, hereby names John Does 1-10 and ABC Corps 1-10 (fictitious names of persons and/or corporations which cannot be ascertained at this time) who has either been misidentified and/or omitted and whose negligence contributed to or caused the injuries sustained herein by plaintiff.

3. At the same time and place aforesaid, the defendant, John Does 1-10 and ABC Corps 1-10 (fictitious names of persons which cannot be ascertained at this time) entrusted the motor vehicle to the use of the defendant as its agent, servant and/or employee so as to cause a violent collision with the vehicle being operated by plaintiff.

4. The defendants, John Does 1-10 and ABC Corps 1-10 (fictitious names of persons and/or corporations which cannot be ascertained at this time), are unknown operators, owners, lessors and lessees of various motor vehicles involved in the motor vehicle accident described herein, who negligently and carelessly operated their vehicles at or near the location of the aforesaid accident.

5. John Does 1-10 and ABC Corps 1-10 (fictitious names of persons and/or businesses that cannot be ascertained at this time) are fictitious names reserved to prospective defendants whose participation in causing the subject accident is unknown to date, and the true identities of these parties are unknown.

WHEREFORE, plaintiff, Aryanna E. Ocasio, hereby demands judgment against the defendant names John Does 1-10 and ABC Corps 1-10 (fictitious names of persons which cannot be ascertained at this time) for the injuries and damages sustained together with interest, attorneys fees and costs of suit.

#### **FOURTH COUNT**

1. Plaintiffs hereby repeat the allegations of the First through Third Counts and incorporate same into this Count as if set forth more fully herein.

2. On or about the 21<sup>st</sup> day of December, 2018, plaintiff, Michell Ocasio was a passenger in the motor vehicle being operated by plaintiff, Aryanna E. Ocasio which was traveling in the right lane of travel on northbound I-295 in the vicinity of MP 21.4, Township of Deptford and County of Gloucester and State of New Jersey.

3. As a direct and proximate result of the aforesaid carelessness, recklessness and negligence of the defendant James Still, the plaintiff Michell Ocasio sustained severe personal injuries which include permanent loss of use of a body member, significant limitation of a bodily function and/or such serious injuries which prevent plaintiff and will prevent plaintiff from performing her usual activities and will in the future force plaintiff to incur medical expenses in the care and treatment of said injuries and has been and will in the future cause plaintiff to be unable to continue with her normal course of activities.

WHEREFORE, plaintiff Michell Ocasio demands judgment against the defendant James Still in a sum which will reasonably compensate her for the injuries and damages sustained together with interest and costs of suit.

#### **FIFTH COUNT**

1. Plaintiffs hereby repeats the allegations of the First through Fourth Counts and incorporates same into this Count as if set forth more fully herein.

2. At the same time and place aforesaid, the defendant, Sand Dollar Specialized & Heavy Haul, was the owner of the motor vehicle being driven by the defendant, James Still

which was involved in the aforementioned motor vehicle accident.

3. The defendant, Sand Dollar Specialized & Heavy Haul did so carelessly and negligently entrust their motor vehicle to the use of the defendant, James Still so as to cause a violent collision with the motor vehicle plaintiff, Michell Ocasio was a passenger in.

4. As a direct and proximate result of the aforesaid carelessness, recklessness and negligence of the defendant, Sand Dollar Specialized & Heavy Haul, the plaintiff sustained personal injuries which include permanent loss of use of a body member; significant limitation of a bodily function and/or such serious injuries which prevented plaintiff and will prevent plaintiff from performing her usual activities and will in the future force plaintiff to incur medical expenses in the care and treatment of said injuries and has been and will in the future cause her to be unable to continue with her normal course of activities.

WHEREFORE, plaintiff Michell Ocasio demands judgment against the defendant Sand Dollar Specialized & Heavy Haul in a sum which will reasonably compensate her for the injuries and damages sustained together with interest and costs of suit.

#### **SIXTH COUNT**

1. Plaintiffs hereby repeats the allegations of the First through Fifth Counts and incorporates same into this Count as if set forth more fully herein.

2. Plaintiff, Michell Ocasio, hereby names John Does 1-10 and ABC Corps 1-10 (fictitious names of persons and/or corporations which cannot be ascertained at this time) who has either been misidentified and/or omitted and whose negligence contributed to or caused the injuries sustained herein by plaintiff.

3. At the same time and place aforesaid, the defendants, John Does 1-10 and ABC

Corps 1-10 (fictitious names of persons which cannot be ascertained at this time) entrusted the motor vehicle to the use of the defendant as its agent, servant and/or employee so as to cause a violent collision with the vehicle being operated by plaintiff.

4. The defendants, John Does 1-10 and ABC Corps 1-10 (fictitious names of persons and/or corporations which cannot be ascertained at this time), are unknown operators, owners, lessors and lessees of various motor vehicles involved in the motor vehicle accident described herein, who negligently and carelessly operated their vehicles at or near the location of the aforesaid accident.

5. John Does 1-10 and ABC Corps 1-10 (fictitious names of persons and/or businesses that cannot be ascertained at this time) are fictitious names reserved to prospective defendants whose participation in causing the subject accident is unknown to date, and the true identities of these parties are unknown.

WHEREFORE, plaintiff, Michell Ocasio, hereby demands judgment against the defendants John Does 1-10 and ABC Corps 1-10 (fictitious names of persons which cannot be ascertained at this time) for the injuries and damages sustained together with interest, attorneys fees and costs of suit.

#### **SEVENTH COUNT**

1. Plaintiffs hereby repeat the allegations of the First through Sixth Counts and incorporate same into this Count as if set forth more fully herein.

WHEREFORE, plaintiffs, Aryanna E. Ocasio and Michell Ocasio hereby demands judgment against the defendants, James Still, Sand Dollar Specialized & Heavy Haul, Inc., John Does 1-10 (fictitious names of persons which cannot be ascertained at this time) and ABC



Corporations 1-10 (fictitious names of persons which cannot be ascertained at this time), individually, jointly, severally and/or in the alternative for such sums of money that will reasonably compensate them for the injuries and damages sustained together with interest, attorneys fees and costs of suit.

ARONBERG, KOUSER, SNYDER  
& LINDEMANN, P.A.  
Attorneys for Plaintiffs

BY: 

JUSTIN H. SPERLING, ESQUIRE

Dated: September 21, 2020

**DEMAND FOR JURY TRIAL**

Plaintiffs hereby demand a trial by jury.

**CERTIFICATION UNDER RULE 4:5-1**

It is hereby certified that this matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding, nor is any other action or arbitration contemplated. Counsel is further unaware of any other parties who should be joined in this action.

**DESIGNATION OF TRIAL COUNSEL**

Please take notice that pursuant to Rule 4:25-4, JUSTIN H. SPERLING, ESQUIRE, is hereby designated as Trial Counsel in the above captioned matter on behalf of the firm of Aronberg, Kouser, Snyder & Lindemann, P.A.

**NOTICE PURSUANT TO RULES 1:5-1(a) and 4:17-4 ( c )**

Please take notice that the undersigned attorneys, counsel for plaintiffs, do hereby demand pursuant to Rules 1:5-1(a) and 4:17 ( c ) that each party herein serve pleadings and interrogatories and receiving answers thereto, serve copies of all such pleadings and answers to interrogatories received from any party, including any documents, papers and other material referred to herein, upon the undersigned attorneys. Please take notice that this is a continuing demand.

ARONBERG, KOUSER, SNYDER  
& LINDEMANN, P.A.  
Attorneys for Plaintiffs

BY: 

JUSTIN H. SPERLING, ESQUIRE

Dated: September 21, 2020

